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ARNOLD SCHWARZENEGGER
GOVERNOR

August 13, 2009

Yolanda Baldovinos, Agency Director
Alameda County Social Services Agency
2000 San Pablo Ave. 4th Floor, Suite #445
Oakland, CA 94612

Dear Ms. Baldovinos:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of Alameda County. Enclosed is the final report on the review.

There were some compliance issues (deficiencies) identified in the report, which will require the development of a corrective action plan (CAP). Please submit your CAP within sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it too, becomes a public document. Per the Governor's Executive Order S-08-09, all compliance reviews (and corresponding CAPs) performed after January 2008 will be posted on the state's Reporting Government Transparency website.

If you need technical assistance in the development of your CAP, please feel free to contact the Civil Rights Bureau at (916) 654-2107 (voice) / (916) 654-2098 (TDD). You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

RAMÓN S. LOPEZ, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Darleen Brooks, Civil Rights Coordinator

Chris Webb-Curtis, Branch Chief, CDSS Supplemental Nutrition Assistance Program
M.S. 8-9-32

Mike Papin, CDSS Supplemental Nutrition Assistance Program
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
COUNTY OF ALAMEDA**

Conducted September 29, 2008

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 6-70
Sacramento, CA 95814
(916) 654-2107**

Reviewer

Cindy S. Guzman

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Alameda County Social Services Agency with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on September 29, 2008 with Darleen Brooks, Civil Rights Coordinator. An exit interview was held on October 3, 2008 to review the findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
North County Self Sufficiency Center	2000 San Pablo Avenue, Oakland	CalWORKS Food Stamps	Spanish Vietnamese
Children & Family Services	24100 Amador Avenue, Hayward	Children's Services Non Assistance Food Stamps	Spanish Vietnamese
Adult & Aging Services Eastmont Town Center	6955 Foothill Blvd., Suite 300 Oakland	Adult Protective Services In-Home Support Services	Spanish Vietnamese

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2006 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Due to budget and staffing constraints, public contact staff interviews were not held during this review.

Program Manager Surveys

Number of surveys distributed	5
Number of surveys received	5

Reviewed Case Files

English speakers' case files reviewed	16
Non-English or limited-English speakers' case files reviewed	40
Languages of clients' cases	Chinese, Cantonese, Vietnamese, Spanish, Tongan, Tagalong, Iranian, Hindi, ASL, English.

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			CPS and APS are 24-hour operations for emergency response. Applicants can access services by telephone, mail or go to any office to drop off or get forms. The Agency website also provides information.
Does the county have extended hours to accommodate clients?		X		CPS and APS are 24-hour operations for emergency response. San Pablo and Foothill Blvd. offices do not have extended hours.
Can applicants access services when they cannot go to the office?	X			Applicants can access services by telephone, mail or go to any office to drop off or get forms. The Agency website also provides information on services.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Website, brochures and fliers, outreach services, community forums, partner meetings and other community events.

Signage, posters, pamphlets	Yes	No	Sometimes	Comments
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?		X		San Pablo, Foothill and Amador offices did not have the current version of Pub 13 available.
Was the Pub 13 available in large print, audiocassette and Braille?		X		It took awhile to find someone in the lobby who knew where the Pub 13 in large print, audiocassette and Braille are kept. Lobby workers had to find someone to help.
Were the current versions of the required posters present in the lobbies?	X			
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			

B. Corrective Actions

Informational Element	Corrective Action Required
Distribution of CDSS' Pub 13	Alameda County shall ensure that the Pub 13 pamphlet, "Your Rights Under California Welfare Programs" is both given and explained to program participants in all of the programs for which CDSS has oversight responsibility. Div. 21-107.221
Translated Pub 13	Alameda County shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language. Div. 21-115.2

Informational Element	Corrective Action Required
Auxiliary aids	Alameda County shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4

C. Recommendation

The most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	03/07
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact your program consultant to receive the most recent versions, or download the Pub 13 from the CRB website
http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: North County Self Sufficiency Center, 2000 San Pablo Avenue

Facility Element	Findings	Corrective Action
Parking	There is no "unauthorized parking" signage at entrance to off-street accessible parking.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____. " (CA T24 1129B.5) p. 133
Exterior entrance	First floor main entrance door pressure excessive at 16 lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195
Outside signage	(ISA) International Symbol of Accessibility sign is missing at both entrances.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353

	No ISA signs – non-glare finish, color contrast.	Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p. 355
Client lobby	<p>Poster: Everyone is Different, but Equal under the Law was missing the CRC contact information.</p> <p>No Pub 13 pamphlets were available for public in all required languages.</p>	<p>Current Poster: Everyone is Different, but Equal under the Law 12/99 3/07, with current CRC information (Div 21-107.211)</p> <p>Current Pub 13 pamphlets: Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and reception areas ...05/01 or 01/04 (Div 21-107.221)</p>
Men's Restroom	<p>First Floor restroom door pressure excessive at 9 lbs.</p> <p>Second Floor restroom door pressure excessive at 11 lbs.</p>	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195</p>
Women's Restroom	<p>First Floor restroom door pressure excessive at 12 lbs.</p> <p>Second Floor restroom door pressure excessive at 10 lbs.</p>	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195</p>

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: Children & Family Services, 24100 Amador Avenue

Facility Element	Findings	Corrective Action
Parking (Shared)	<p>There is no "unauthorized parking" signage at entrance to off-street accessible parking.</p> <p>Four freestanding handicapped signs (in front of building) are too low at 30" high.</p>	<p>Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p. 133</p> <p>Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p 133</p> <p>Wall signage shall be centered 36" minimum above grade, ground, or sidewalk at the interior end of space. (CA T24 1129B.5) p. 133</p>
Outside signage	(ISA) International Symbol of Accessibility sign is missing on downstairs lobby entrance, and on second floor lobby entrance. (Main building entrance did have ISA).	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353

	No ISA signs – non-glare finish, color contrast	Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p 355
Client lobby	No Pub 13 pamphlets were available for public in all required languages.	Current Pub 13 pamphlets: 05/01 or 01/04 (Div 21-107.221)
Men's Restroom	First Floor restroom door pressure excessive at 15 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
	Second Floor restroom door pressure excessive at 12 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
Women's Restroom	First Floor restroom door pressure excessive at 17 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
	Second Floor restroom door pressure excessive at 18 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
	First Floor restroom pipes under sink not securely insulated (pipes under sink closest to door).	Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p. 267

Facility Location: Adult & Aging Services Eastmont Town Center, 6900 Foothill Blvd.

Facility Element	Findings	Corrective Action
Parking	<p>Signage on pavement does not clearly depict a wheelchair w/occupant due to being faded. Needs to be repainted.</p> <p>No "No Parking" painted on pavement in access aisles (letters min. 12" high).</p> <p>An access aisle does not connect to the accessible path of travel.</p>	<p>Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.5.1 & 2) p. 133</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p. 135</p> <p>Access aisles (load and unload) must connect to the accessible path of travel, including curb cuts or ramps as needed (CA T24 1129B.4.3, ADA 4.6.3) p. 136</p> <p>Walkways minimum 48" (CA T24 1133B.7.1) p. 160</p>
Outside signage	<p>(ISA) International Symbol of Accessibility sign is missing on main entrance and A & A lobby.</p> <p>No ISA signs – non-glare finish, color contrast</p>	<p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353</p> <p>Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p. 355</p>

	No ISA signs – non-glare finish, color contrast	Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p. 355
Client lobby	No Pub 13 pamphlets were available for public in all required languages.	Current: 05/01 or 01/04 (Div 21-107.221)
Elevator	Accessible Elevator Entrance was not marked accessible with the International Symbol of Accessibility.	Entrances that are accessible to and usable by persons with disabilities are identified with at least 1 International Symbol of Accessibility. Additional directional signs using the symbol are visible along approaching pedestrian ways. (CA T24 1117.B.5.8.1.2) p. 229
Woman's Restroom	Soap Dispenser too high at 50".	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.9.2 and CA T24 1115B.9.1.2, ADA 4.19.6) p. 269

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			Through application process with language form 5085
Does the county use a primary language form?	X			Form 5085
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

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Does the county identify a client's language need upon first contact? How?	X			Through application process with language form 5085
Does the county use a primary language form?	X			Form 5085
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			

Question	Yes	No	Some-times	Comments
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			Every effort is made to assign clients to a bilingual worker. If they are not able to assign a bilingual worker, then the assigned worker will utilize the Language Line.
Are county interpreters determined to be competent?	X			They are certified
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?	X			The county only allows minors as interpreters in emergency and extenuating situations.
Does the county allow the client to provide his or her own interpreter?	X			
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			
Does the county use the CDSS-translated forms in the clients' primary languages?	X			Through CalWin they print the forms in the client's primary language.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			

Question	Yes	No	Some-times	Comments
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Ethnic origin documentation	Emergency Response Form, New Case File Form.	IHSS Intake Form, APS Screening Form.	Language Form 5085	Language Form 5085
Primary language documentation	Case Comments in CalWin and Court Papers	IHSS Intake Form, APS Screening Form	Language Form 5085 CalWin Case Comments	Language Form 5085 CalWin Case Comments
Method of providing bilingual services and documentation	CalWin Case Comments	Case comments.	None noted in sample cases.	None noted in sample cases.
Client provided own interpreter	CalWin Case Comments	Case comments.	None noted in sample cases.	None noted in sample cases.

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Method to inform client of potential problem using own interpreter	CalWin Case comments	None noted in sample cases.	None noted in sample cases.	None noted in sample cases.
Release of information to Interpreter	Narrative, case notes	None noted in sample cases.	None noted in sample cases.	Narrative case notes.
Individual's acceptance or refusal of written material offered in primary language	N/A	In Case comments.	Statement of Facts.	Statement of Facts.
Documentation of minor used as interpreter	None noted in sample cases.	None noted in sample cases.	No minors used as noted.	No minors used as noted.
Documentation of circumstances for using minor interpreter temporarily	None noted in sample cases.	None noted in sample cases.	None noted in sample cases.	None noted in sample cases.
Translated notice of actions (NOA) contain translated inserts	Provided as needed.	Provided as needed.	Provided as needed.	Provided as needed.
Method of identifying client's disability	Statement of Facts and narratives in case comments.	Case file assessment.	Statement of Facts and narratives in case comments.	Statement of Facts and narratives in case comments.
Method of documenting a client's request for auxiliary aids and services	N/A	Case file assessment.	None noted in sample cases.	None noted in sample cases.

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Documentation of minor used as interpreter	None noted in sample cases.	None noted in sample cases.	No minors used as noted.	No minors used as noted.
Documentation of circumstances for using minor interpreter temporarily	None noted in sample cases.	None noted in sample cases.	None noted in sample cases.	None noted in sample cases.
Translated notice of actions (NOA) contain translated inserts	Provided as needed.	Provided as needed.	Provided as needed.	Provided as needed.
Method of identifying client's disability	Statement of Facts and narratives in case comments.	Case file assessment.	Statement of Facts and narratives in case comments.	Statement of Facts and narratives in case comments.
Method of documenting a client's request for auxiliary aids and services	N/A	Case file assessment.	None noted in sample cases.	None noted in sample cases.

B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23

B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22
General	Alameda County must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

IX. CONCLUSION

The CDSS found the Alameda County Social Services in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws with minor exceptions. The CDSS would like to acknowledge and thank Darleen Brooks, Civil Rights Coordinator for her assistance, and cooperation throughout the review process.

The Alameda County Social Services must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report. The plan must include a schedule by which all actions will be taken to correct the deficiencies.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.